

October 18, 1999

Dockets Management Branch (HFA-305) Food and Drug Administration 5630 Fishers Lane Room 1061 Rockville, MD 20852

RE: Guidance for Industry: Revised Precautionary Measures to Reduce the Possible Risk of Transmission of Creutzfeldt-Jacob Disease (CJD) and New Variant Creutzfeldt-Jacob Disease (nvCJD) By Blood and Blood Products 64 Fed. Reg. 44739 (1999) [Docket No. 97D-0318) August 17, 1999]

## Dear Docket Officer:

This letter is to provide public comments on behalf of the American Red Cross (ARC or Red Cross) concerning the Food and Drug Administration's (FDA or Agency) Draft Guidance for Industry published on August 17, 1999 (the Guidance). The Guidance provides recommendations for blood collection facilities and their consignees for precautionary measures to reduce the possible risk of transmission of Creutzfeldt-Jacob Disease (CJD) and new variant Creutzfeldt-Jacob Disease (nvCJD) by blood and blood products.

Red Cross, through its 37 Blood Services regions, supplies almost half of the nation's blood component transfusion needs. Red Cross has initiated efforts to comply with the Guidance and anticipates full compliance within the six month time frame recommended in the Guidance.

Red Cross would like to take this opportunity to indicate to the FDA our full endorsement of the public comment letter that has been submitted by the American Association of Blood Banks (AABB) including AABB's recommendation that the requirements associated with the theoretical risk factors to nvCJCD should be implemented in a prospective manner only.

On behalf of the American Red Cross, I would like to express my appreciation for the opportunity to submit our views. If you have any questions on this letter, please contact Anita Ducca, Director, Regulatory Relations at 703-312-5601.

Sincerely,

Glenn M. Mattei, Bsq.

Senior Director, Quality Assurance and

Regulatory Affairs Biomedical Services American Red Cross